

FILED

JUL 27 2016

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY LN DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

JEREMY MCGOWAN,

Defendant.

CRIMINAL NO. **MD 16CR - 173**
INDICTMENT
[Vio: 18 U.S.C. § 2251(a) -
Production of Child Pornography;
18 U.S.C. § 1470 - Transfer of Obscene
Material to a Minor Under 16
Years of Age;
18 U.S.C. § 2260A - Commission of a Felony
Sex Offense by an Individual
Required to Register as a Sex Offender]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 2251(a)]

That on or about July 4, 2016, in the Western District of Texas, the Defendant,

JEREMY MCGOWAN,

did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using any means and facility of interstate or foreign commerce by any means, in violation of Title 18, United States Code, § 2251(a).

COUNT TWO
[18 U.S.C. § 1470]

That on or about July 4, 2016, in the Western District of Texas, the Defendant,

JEREMY MCGOWAN,

did use any facility of interstate and foreign commerce, to wit: a cellular telephone, to knowingly transfer obscene matter to another individual who had not attained the age of 16 years, knowing that such other individual had not attained the age of 16 years.

A violation of Title 18, United States Code, Section 1470.

COUNT THREE
[18 U.S.C. § 2260A]

The Grand Jury further alleges that the Defendant,

JEREMY MCGOWAN,

committed the felony offenses involving a minor charged in Count One and Count Two of this Indictment at times Defendant **JEREMY MCGOWAN** was required to register as a sex offender under the laws of the state of Texas.

All of which is a violation of Title 18, United States Code, Section 2260A.

A TRUE BILL.

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY



BRANDI YOUNG
Assistant United States Attorney

**Original signed by the
foreperson of the Grand Jury**